



JAMESTOWN S'KLALLAM TRIBE

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March 19, 2003

Tom Brincefield
EPA Region 10, 1200 Sixth Avenue
Seattle WA 98101

RECEIVED

MAR 20 2003

RE: Brownfields Cleanup Grant Application

Environmental Cleanup Office

Dear Mr. Brincefield:

Enclosed please find one original of our Final application for the above grant. Please be aware that we have **modified the proposal** from our initial submission dated December 16, 2002.

- We have focused on clean up of the highest priority site and postponed site two clean-up.
- Project cost has been reduced to \$175,000.
- We have provided an on-site source of match and assuming this is acceptable we no longer request a hardship waiver.

These changes have been made based on community input and advice from the Tribal Council.

The project is to remove creosote treated pilings from a former industrial log storage and shipping site located in estuary wetlands. **Our vision is to restore the area to natural conditions.** This will help in the restoration of an ESA-listed salmon stock, eelgrass beds and shellfish resources, and will improve eco-tourism opportunities. The natural resources of the estuary are of direct economic and cultural significance to the Tribe and its individual members. Eliminating this creosote **will reduce the human health threat from consuming contaminated shellfish**, for which West Coast tribal members are a sensitive population due to high shellfish consumption rates.

This proposal is part of a much larger project to restore ecosystem function to the entire estuary to meet both **Tribal and non-tribal community needs**. The restoration is a multi-agency **multi-partner effort**, involving twenty local, state, federal, and private entities including local land owners, all of whom are involved in project planning. Removal of the pilings is an essential element of the overall restoration.

No new infrastructure will be needed, and the **existing infrastructure will directly benefit** from the proposal. Clean up and redevelopment will **create a greenspace** out of a former industrial site.

Substantial funding will be leveraged. **State funding** has been identified for clean up of other contaminated material and site redevelopment but so far no funding for piling removal has been found.

I hope the details provided in the application sufficiently answer your questions and that you are able to fund our proposal.

Sincerely,

Lyn Muench, Natural Resources Planner

cc: Myra Blakely, EPA Headquarters

**BROWNFIELDS CLEANUP GRANT PROGRAM
FINAL PROPOSAL
JAMESTOWN S'KLALLAM TRIBE**

MAR 20 2003

Environmental Cleanup Office

Project Summary: The project is to remove creosote treated pilings from a former industrial log storage and shipping site located in estuary wetlands. The industrial activity has ceased and the Tribe now owns the property. The pilings currently cause water quality and habitat degradation and must be removed. Each piling also has an associated "footprint" that eliminates subtidal area that formerly supported shellfish, eelgrass, and other natural estuarine habitat. The pilings also interfere with recreational use of the site. We have modified our Final proposal on the basis of input from the community and the Tribal council. We will clean up our highest priority site and postpone clean-up of site two. This reduces total project cost and alters our proposed cost share.

Our vision is to restore the area to natural conditions. This will help in the restoration of an ESA listed salmon stock, eelgrass beds and shellfish resources, and will improve eco-tourism opportunities. The natural resources of the estuary are of direct economic and cultural significance to the Tribe and its individual members.

- Elimination of creosote will reduce the human health threat of consuming contaminated shellfish by Tribal members, who are sensitive due to their high fish consumption rates.
- The larger community is also concerned with the water quality, natural resources and recreational values of the estuary.
- Piling removal will eliminate a harmful water pollutant (creosote) and
- Piling removal will eliminate a navigational hazard to recreational boating, an eco-tourism source, and improve the aesthetics of adjacent infrastructure, a non-motorized trail.

This proposal is part of a much larger project to restore ecosystem function to the entire estuary. The restoration is a multi-agency, multi-partner effort, involving twenty local, state, federal, and private entities including local landowners, all of whom are actively involved in project planning. Removal of the pilings is an essential element of the overall restoration.

No new infrastructure will be needed, and existing infrastructure will directly benefit. Redevelopment of the site will create a greenspace estuary wetland out of a former industrial site.

Substantial funding will be leveraged: State funding has been identified for removal of other contaminated material and redevelopment but so far no funding for piling removal has been found. **We are requesting \$175,000 from EPA and will contribute \$35,000 of this state-funded cleanup as a 20% cost share. If our proposed cost share is accepted as eligible we will not need a hardship waiver.**

Project Tasks: The Tribe's Natural Resource Department Habitat Biologist and Project Engineer will oversee the cleanup of the site. 75 test holes will be made to determine the extent of creosote contamination in the project area. The Tribe will then contract with a private firm specializing in a new technique for removal of 86 creosote pilings and surrounding sediments. Other contaminated material will also be removed from the project area as part of a state-funded cleanup contract. The Project Engineer will coordinate these two clean-up actions, including permitting, contract preparation and other eligible programmatic costs. The Habitat Biologist will supervise the test holes, the monitoring of environmental results of the clean up, and report per 40 CFR 30.51 etc. The monitoring itself, by tribal staff and volunteers, is not included in this project.

BUDGET	Task 1 Dig Test Holes	Task 2 Cleanup Contracting	Task 3 Piling Cleanup	Task 4 Other Cleanup	Task 5 Monitor & Report	Total
Personnel	\$2,400	\$22,367		\$11,183	\$2,400	\$38,350
Supplies	\$137	\$1,417		\$709	\$137	\$2,400
Contracts	\$5,250		\$129,000			\$134,250
Grant Total	\$7,787	\$23,784	\$129,000	\$11,892	\$2,537	\$175,000
Cost Share				\$35,000		\$35,000
Total	\$7,787	\$23,784	\$129,000	\$46,892	\$2,537	\$210,000

Task 1. Dig and test 75 test holes to determine the extent of creosote contamination at various locations in the project area. (Habitat Biologist: 40 hours @ \$60/hour, and supplies, plus test/lab fees @ \$70 per test).

Task 2. Obtain permits, hire contractor, coordinate clean up activities (Project Engineer: 414 hours @ \$54/ hour, plus supplies).

Task 3. Remove 86 pilings and associated sediments at a cost of \$1,363.63 per piling quoted in 2002, plus a 10% contingency/cost of living increase (Contract).

Task 4. Remove other contaminated materials from project area (Project Engineer: 207 hours, supplies, plus a portion of a state funded clean-upcontract to be designated as cost share).

Task 5. Monitor environmental results, report per 40 CFR 30.51 etc.(Habitat Biologist: 40 hours @ \$54/hour plus supplies.)

Position	Hours	Rate	Subtotal
Project Engineer	621	\$54	\$33,534
Habitat Biologist	80	\$60	\$4,800

Supplies\$2,400

This item includes charges for office supplies associated with permits, contracts, monitoring and reports.

Contract 1\$129,000

This charge is for the removal of 86 pilings at a cost of \$1,363.63 per piling quoted in 2002, plus a 10% contingency/cost of living increase work to be completed early 2004 .

Contract 2\$5,250

This charge is for 75 test holes, with lab tests, which together cost \$70/test, to determine the extent of creosote contamination in the project area.

Total Cleanup Grant Request\$175,000

Cost Share\$35,000

This is a portion of the cost of a state funded contract to remove other contaminated material from the intertidal and nearshore of the project area.

Total Project Cost\$210,000

Cleanup Grant Criteria

A. Sustainable Reuse of Brownfields/Development Potential

1. Our **vision** is to restore an estuary that has been degraded by 100 years of industrial and infrastructure development back to its natural condition. This will benefit a salmon species listed as Threatened by the Endangered Species Act and many other species of wildlife, and create a greenspace of recreational and aesthetic value. The Tribe's goal is to restore the habitat needed for salmon and shellfish populations for which it has a treaty protected right to harvest. The wider community has since completion of a watershed plan in 1991 been working on removal of pollutants in the estuary. The creosote pilings to be removed by this project were listed as one of the top six pollution sources.
2. This clean-up is **part of a much larger project** to restore ecosystem function to an estuary of great importance to the Jamestown S'Klallam Tribe. The natural resources of the estuary are of direct economic and cultural significance to the Tribe and its individual members. The larger community is also concerned with water quality and natural resources of the estuary. **The restoration is a multi-agency multi-partner effort, involving twenty entities at the local, state, federal, and private levels.** It implements the community based Sequim Bay Watershed Master Plan. A recommendation of the plan was *"Toxins Recommendation #10: Amend County Shorelines Management Act to prohibit creosote treated pilings, especially over sensitive shellfish areas."* The Shorelines Management Act was subsequently amended. The Port Authority was forced to install concrete pilings, and private docks have also been required to use alternatives to creosote. Removal of a significant number of the remaining creosote pilings in the watershed would be a positive step forward for this community.

A description of the overall restoration is contained in Appendix A of our initial Brownfields application. A table of partners, and their financial contributions to date, is in Attachment B. **Removal of the creosote contaminated pilings and associated sediments is an essential element of the overall restoration.** Freshwater restoration elements are nearing completion. Funding has been identified for removal of other contaminants and nearshore restoration but so far no funding for piling removal has been found.

3. **Direct economic benefit** from the clean-up will be **an increase in finfish and shellfish resources, an important food and revenue source for Tribal members and others. There will also be recreation/tourism benefits.** Clean up of the pilings will remove a navigation barrier to small boats, especially sea kayaks, which are a growing eco-tourism activity. Piling removal will improve aesthetics for the Olympic Discovery Trail, which travels along the edge of the restoration site. This non-motorized trail crosses the Peninsula to the Pacific. It provides public access and generates recreation (hiking and biking) opportunities with associated economic benefits to the community.



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B. Reduction of Threats to Human Health and the Environment

1. This project will **reduce a human health threat: potential consumption of contaminated shellfish**. Creosote primarily consists of liquid and solid polycyclic aromatic hydrocarbons (PAHs) and up to 3% tar acids and a lower percentage of tar bases; most pilings contain 30 to 40 gallons of creosote. Shellfish filter the water in which they live, and can retain toxins in their flesh. Any toxins in the shellfish are then consumed. Removal of the pilings will remove this toxin source from shellfish growing waters harvested by both Tribal members and the general community.
2. There are **no anticipated negative environmental impacts** from cleanup. We will use a new technique that removes the piling and the sediment around each piling to insure no residual environmental damage. Clean up will be timed to avoid migration of fish and waterfowl. Pilings and other contaminated materials will be disposed in an approved off-site facility.
3. This project is sponsored by and will take place on land owned by a Federally recognized **Native American Tribe, which, based on US Census and other information, is both a minority population and a low-income community**. The project will clean up a shellfish harvest area where Tribal subsistence shellfish harvesters (gathering shellfish to feed their families) are directly impacted by the negative water quality impacts of the creosote. **Tribal members are disproportionately affected by contaminated shellfish because of their higher than average shellfish consumption rate**, which EPA-sponsored research has clearly established for Tribes in Western Washington.
4. **Removal of the creosote pilings, sediment and related waste will eliminate this human health threat.**
5. **The Tribe's Natural Resource Director is the environmental authority** for this project. We are working with the State Department of Ecology and the State Department of Natural Resources. The method we propose for piling removal meets and exceeds the State's current standards and procedures for such cleanup work.

C. Reuse of Existing Infrastructure

1. **No expansion of infrastructure** will be required for this project.
2. The site will be redeveloped into habitat for finfish and shellfish, and **will create an area of navigable water that will serve as infrastructure for recreational boating**. An old railroad route along the near-shore will be cleaned up (creosote trestles removed) by one of the Tribe's partners, and the **right of way will be re-used as a non-motorized public access trail** as part of the larger clean-up and restoration project.

D. Greenspace/Open Space

1. This grant will directly facilitate the **creation of a greenspace, by redeveloping a disused industrial site into a restored estuary for both habitat and recreation**. It will clean up an intertidal and nearshore area by removal of the creosote impregnated pilings and associated sediments, and other contaminated materials, with the following environmental/greenspace benefits:

- **Net gain of approximately 7.32 acres of intertidal wetland habitat** for natural recolonization of shellfish, eelgrass and other benthic and epibenthic plants and animals
 - **Improved water and sediment quality** due to removal of creosote from the aquatic environment
 - Improved sediment transport
 - Improved feeding and rearing habitat for juvenile salmonids
 - Improved feeding and roosting habitat for migratory waterfowl and shorebirds
 - **Removal of a navigation barrier to small boats**, especially sea kayaks, which are a growing eco-tourism activity.
 - **Improved aesthetics for the Olympic Discovery Trail** that travels along the edge of the restoration site. This non-motorized trail crosses the Peninsula to the Pacific. It provides public access and recreation (hiking and biking) opportunities for local and tourist populations.
2. **This clean-up site is integrated with clean-up of other creosote structures (trestles on the old railroad right of way) and related removal of fill and other contaminated materials throughout the larger Jimmycomelately Estuary Restoration Project.** Once we have successfully used this new technique for piling and sediment removal we plan to apply it to other nearby sites with creosote pilings. **The Jimmycomelately Estuary Restoration Project is intended as a model for similar restoration in other regional watersheds.** The restoration team members regularly give presentations and produces publications to make our methodology available to others.

E. Community Involvement

1. **The community has been informed about this specific project through several media.** The Tribe and its partners formed an Estuary Restoration Design Group, (EDG) a **steering group with representatives** of public agencies, non-profits and local landowners, to plan and execute the overall estuary restoration project. EDG has designed this project and been directly involved in proposal development. This and many other aspects of the restoration were presented at a **neighborhood meeting** held in the fall of 2001. All residents in the vicinity of the project site were invited to attend; nearly 80% did so. Strong support for all aspects of the restoration was expressed. The community was also informed through a **formal SEPA Environmental Review** process with Clallam County in August and September of 2001. **For development of this Final Proposal, input was received from the Tribal Council and the EDG that caused us to modify our initial proposal.** It was felt that we should focus on the highest priority site, adequately fund that effort, and postpone cleanup of Site 2 until the Site1 cleanup is successfully completed. It was also decided that a modest increase in funding for Site 1 would insure complete clean up. It could be coordinated with cleanup of the intertidal area and adjacent nearshore of the project area sediments containing other contaminated materials. This cleanup of other contaminated materials will provide the match for this grant proposal. **The EDG approved the final proposal on March 6, 2003. The Tribal Council approved the final proposal at its meeting on March 10, 2003. A letter was**

then mailed to all the neighbors offering them an opportunity to comment on the final proposal before the submission date.

Contacts:

John McLaughlin, 360-683-8251, represents local landowners on the Estuary Design Group. He is also an active representative of sports fishing interests on the Peninsula.

Dave Shreffler, Shreffler Environmental, 360-582-1712, is a private environmental consultant who has been the coordinator for the Estuary Design Group partnership and author of the monitoring plan.

Ed Chadd, 360-417-2281, directs StreamKeepers, a community volunteer organization that monitors water quality in this and other local watersheds.

Eloise Kailin, 360-683-6644, local land owner and President, Protect the Peninsula's Future, a long-time citizens environmental advocacy non-profit organization.

2. Partnerships have been the hallmark of this project. Since the early 1990's, individuals from the following **twenty local, state, federal and private entities** have participated in various aspects of the restoration planning process: The Jamestown S'Klallam Tribe, Clallam County, Clallam Conservation District, Washington State University Cooperative Extension, Washington State Department of Fish and Wildlife, Washington State Department of Transportation, Washington State Department of Natural Resources, U. S. Forest Service, U.S. Fish and Wildlife Service, U.S. Environmental Protection Agency, U.S. Army Corps of Engineers, Trout Unlimited, Washington Environmental Council, North Olympic Salmon Coalition, Protect the Peninsula's Future, Puget Sound Action Team, Battelle Marine Sciences Laboratory, Shreffler Environmental, Jefferson County, National Audubon Society, and Olympic Peninsula Audubon Society. In addition, local landowners are very involved in the project.
3. **This partnership will continue to be involved in all aspects of clean-up decision making and re-use planning.** The Estuary Design Group, with key agency and community representatives, meets approximately every two weeks.
4. The larger affected community has been regularly informed of this proposal through extensive media coverage over the past three years, and through a series of public presentations to local groups. **We will continue to use public meetings and the press to keep citizens informed.**

